REMARKS

In the Final Office Action dated February 25, 2003, the Examiner rejected claims 1-26 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,272,281, to De Vos et al ("De Vos") in view of U.S. Patent No. 5,717,281 to Egawa et al. ("Egawa"). Claims 1-26 remain currently pending.

Claims 1-26 are patentable over De Vos in view of Egawa because De Vos and Egawa, in combination or alone, fail to teach or suggest all the features of claims 1-26. For example, claim 1 recites an interactive multimedia system that includes a set of storage devices, a massively parallel video server, a plurality of client devices, and a high capacity transport system. The massively parallel video server includes a plurality of processors all having concurrent access to the same set of storage devices for streaming a plurality of video streams.

De Vos and Egawa, in combination or alone, fail to teach or suggest the features of claim 1. The Examiner correctly admits that De Vos fails to teach, for example, a massively parallel video server that includes a plurality of processors all having concurrent access to the same set of storage devices for streaming a plurality of video streams. (See Final Office Action at page 2.) However, the Examiner alleges that it would have been obvious to one of ordinary skill at the time the invention was made to modify De Vos with the teachings of Egawa to arrive at the features of claim 1. (See Final Office Action at page 2.) The Applicant respectfully disagrees.

Egawa fails to cure the deficiencies of De Vos. In the Final Office Action, the Examiner relies on Egawa at column 1, lines 29-52 to allegedly cure the deficiencies of De Vos. (Id.) In this passage, Egawa discloses a server that includes a storage device consisting of a plurality of hard disks, a processing device, and a personal computer.

(Egawa at col. 1, lines 30-36.) The processing device comprises a plurality of processing modules that receive a request signal and read video data from the plurality of hard disks in the storage device. (Egawa at column 1, lines 33-42 and lines 48-50.) The personal computer processes the video data read by the processing device, transforms the video data into a communication format, and transmits the video data through a network. (Egawa at column 1, lines 42-46.) Although the processing device accesses the video data in parallel from the storage device, the processing device is serially connected to the personal computer. (See Egawa at Fig. 1.) Thus, the video data is provided from the processing device to the personal computer in a serial fashion.

Since the processing device and personal computer of Egawa's server are serially connected, the processor in the personal computer does not have concurrent access to the plurality of hard disks in the storage device. Therefore, only some of the processors in Egawa's server (i.e., only the processing modules, but not the personal computer) have concurrent access to the same set of storage devices.

Of note in the Final Office Action, the Examiner also remarks of Egawa that "despite the serial connection between the personal computer 6 and the Processing Device 2 . . ., a plurality of video streams are transferred from Processing Device 2 to the Multiplexing/Switching Unit 7 via personal computer 6 . . ." (Final Office Action at pages 7-8.) Although the Applicant respectfully disagrees with this characterization of Egawa, even if it were true, the serially connected processor of the personal computer in Egawa's server still would not have concurrent access to the hard disks in the storage device. Therefore, Applicant respectfully submits that Egawa fails to teach or suggest a massively parallel video server that includes a plurality of processors all having

concurrent access to the same set of storage devices for streaming a plurality of video streams, as recited in claim 1.

Accordingly, even if De Vos and Egawa were properly combinable, the combination would still fail to teach or suggest all the features of claim 1 and its respective dependent claims 2-16. Reconsideration and withdrawal of the rejection of claims 1-16 is therefore respectfully requested.

Claim 17 recites a method for delivering interactive multimedia from storage devices to a plurality of subscribers at a subscriber site. A plurality of video streams are streamed from one or more video titles stored in a massively parallel video server that includes a plurality of processors all having concurrent access to the same storage devices. The video streams are then transported to a plurality of clients via a high capacity transport system.

As explained above, De Vos and Egawa, in combination or alone, fail to teach or suggest, for example, a massively parallel video server that includes a plurality of processors all having concurrent access to the same storage devices. Therefore, De Vos and Egawa, in combination or alone, also fail to teach or suggest streaming a plurality of video streams from one or more video titles stored in a massively parallel video server that includes storage devices and a plurality of processors all having concurrent access to the same storage devices, as recited in claim 17.

Accordingly, even if De Vos and Egawa were properly combinable, the combination would still fail to teach or suggest all the features of claim 17 and its respective dependent claims 18-26. Reconsideration and withdrawal of the rejection of claims 17-26 is therefore respectfully requested.

CONCLUSION

Applicant respectfully requests that this Request for Reconsideration under 37 C.F.R. § 1.116 be entered by the Examiner and that pending claims 1-26 be allowed. Applicant submits that the remarks in the Request for Reconsideration do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Request for Reconsideration should allow for immediate action by the Examiner.

Furthermore, Applicant respectfully points out that the final action by the Examiner presented some new arguments with respect to the application of the art against Applicant's invention. It is respectfully submitted that the entering of the Request for Reconsideration would allow the Applicant to reply to the final rejections and place the application in condition for allowance.

Finally, Applicant submits that the entry of the Request for Reconsideration would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicant submits that claims 1-26 are neither anticipated nor rendered obvious in view of the prior art references cited against the claims. Applicant therefore requests the entry of this Request for Reconsideration, the Examiner's reconsideration of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 07-2339.

Respectfully submitted,

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